

Ahilan T. Arulanantham (SBN 237841)
arulanantham@law.ucla.edu
CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW
385 Charles E. Young Dr. East
Los Angeles, CA 90095
Telephone: (310) 825-1029

Emilou MacLean (SBN 319071)
emaclean@aclunc.org
Michelle (Minju) Y. Cho (SBN 321939)
mcho@aclunc.org
Amanda Young (SBN 359753)
ayoung@aclunc.org
ACLU FOUNDATION
OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111-4805
Telephone: (415) 621-2493
Facsimile: (415) 863-7832

Attorneys for Plaintiffs
[Additional Counsel Listed on Next Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**PLAINTIFFS' SUPPLEMENT TO
MOTION FOR COMPLIANCE [ECF 286]**

1 Additional Counsel for Plaintiffs

2 Jessica Karp Bansal (SBN 277347)
jessica@ndlon.org

3 Lauren Michel Wilfong (*Pro Hac Vice*)
lwilfong@ndlon.org

4 NATIONAL DAY LABORER
ORGANIZING NETWORK

5 1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105

6 Telephone: (626) 214-5689

7 Eva L. Bitran (SBN 302081)

ebitran@aclusocal.org

8 ACLU FOUNDATION
OF SOUTHERN CALIFORNIA

9 1313 West 8th Street

Los Angeles, CA 90017

10 Telephone: (213) 977-5236

11 Erik Crew (*Pro Hac Vice*)

ecrew@haitianbridge.org

12 HAITIAN BRIDGE ALLIANCE

4560 Alvarado Canyon Road, 1H

13 San Diego, CA 92120

Telephone: (949) 603-7411

1 **PLAINTIFFS' SUPPLEMENT TO MOTION FOR COMPLIANCE**

2 Since the time that Plaintiffs filed their motion regarding non-compliance with this Court's
3 order of Friday, September 5, 2025, ECF 286, they have learned of an additional, related form of
4 non-compliance.

5 Early this morning, Plaintiffs' counsel learned that Defendants had closed the period for
6 Venezuelans to register for TPS under the January 17, 2025 extension that is now in effect. The
7 extension states that eligible TPS holders could re-register "*through* September 10, 2025," 90 Fed.
8 Reg. 5961, 5962 (emphasis added), but Defendants inexplicably took down the online registration
9 option for Venezuela at some point before then. Numerous attorneys and legal service providers
10 began contacting Plaintiffs' counsel very early this morning to report that their clients had been
11 unable to register. Screenshots they attached confirmed the shift. *See* Declaration of Jessica Karp
12 Bansal; Declaration of Swapna C. Reddy; and Declaration of Marcela Villeda Sanchinelli.

13 Plaintiffs' counsel asked Defendants' counsel to re-open the registration window for at least
14 24 hours, and to provide Plaintiffs' counsel four hours' notice of that, so that TPS holders could
15 register as required by this Court's order and the January 17 extension. *See* Declaration of Jessica
16 Karp Bansal, **Ex. A**. Plaintiffs' counsel asked Defendants' counsel to respond by 12:00 p.m. PT
17 today, but they have provided no response as of this time. *Id.* At approximately 3:30 p.m. PT / 6:30
18 p.m. ET, as Plaintiffs were finalizing this supplement to file, they learned that USCIS has apparently
19 re-opened the online registration option for Venezuelan TPS holders. Even if the portal is open and
20 remains so, this means that for virtually the entire last day that Venezuelan TPS holders had
21 available to re-register, the portal was unavailable to them.

22 Plaintiffs intend to raise this issue at the hearing set for tomorrow afternoon, and ask that
23 Defendants address it in their response due tomorrow morning.

24
25 Date: September 10, 2025

Respectfully submitted,

26 ACLU FOUNDATION
27 OF NORTHERN CALIFORNIA

28 /s/ Emilou MacLean
Emilou MacLean

Michelle (Minju) Y. Cho
Amanda Young
ACLU FOUNDATION
OF NORTHERN CALIFORNIA

Ahilan T. Arulanantham
CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW

Eva L. Bitran
Diana Sanchez
ACLU FOUNDATION
OF SOUTHERN CALIFORNIA

Jessica Karp Bansal
Lauren Michel Wilfong (*Pro Hac Vice*)
NATIONAL DAY LABORER
ORGANIZING NETWORK

Erik Crew (*Pro Hac Vice*)
HAITIAN BRIDGE ALLIANCE

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2025, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

ACLU FOUNDATION OF NORTHERN
CALIFORNIA

/s/ Emilou MacLean